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October 5, 2021

Via ECF

Hon. Naomi Reice Buchwald, U.S.D.J.
United States District Court, S.D.N.Y.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 21A
New York, NY 10007-1312

Re: Rule 37 Motion Briefing Schedule
Case No.: 1:21-cv-01791(NRB)—Rachel Filsoof v. Andrew J. Cole
Client No: 1272-1001

Dear Judge Buchwald:

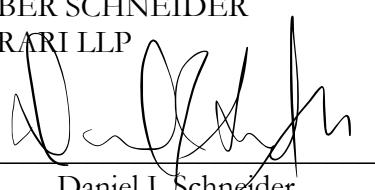
This letter is to request a briefing schedule with respect to the motion filed by Plaintiff today for an order pursuant to Fed. R. Civ. P. 37. Based upon current needs and obligations of my office, we would request November 1, 2021 for opposition to this motion. Presuming Plaintiff would like a reply, I would think November 10, 2021 would be sufficient for full submission in light of the time I have requested.

I have not conferred about this briefing schedule with Mr. Bostany and therefore, this is not a joint letter. In the event that a different date would be preferable to Plaintiff's three separate law firms, they may respond to this letter. This is the first request of this kind.

Respectfully submitted,

FARBER SCHNEIDER
FERRARI LLP

By:


Daniel J. Schneider

DJS/tim

cc: Via ECF

John Bostany, Esq.
Samantha Welborne, Esq.

Application granted.
Defendant's
opposition is due
November 1, 2021 and
Plaintiff's reply is
due November 10,
2021. **SO ORDERED.**


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE
Dated: New York, New York
October 6, 2021

*Licensed in New York, California,
Illinois and Massachusetts